

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Proposed Rules Permitting Antenna)	MM Docket No. 93-177
Modeling to Verify AM Directional)	
Antenna Performance)	
To the Commission:		

COMMENTS

Sitesafe, Inc. ("Sitesafe") hereby submits these Comments in the above captioned proceeding as invited by Public Notice DA 07-2143. These comments concern the recommendations and draft rules offered by the AM Directional Antenna performance Verification Coalition ("Coalition") in their letter dated May 4, 2007. Specifically addressed are areas of the Proposed New Rule Under Part 17 - Construction Near or Installation on an AM Broadcast Antenna System or Tower.

Sitesafe provides RF compliance services to the wireless industry, specializing in AM detuning services, RF health and safety verification, and frequency coordination.

The comments submitted herewith support the notion of rule changes to consolidate and clarify the rules for construction on or near AM stations as well as to permit antenna modeling as a method to determine disturbances to AM antenna radiations patterns. We also believe that measurements should continue to be a viable option in determining interference and should not be excluded by the adoption of these rules.

In addition, these comments seek clarification on the Coalition's proposed draft revisions to the rules, to wit:

- (a) Part 17 (a) details when notification should occur. Our experience has shown that this notification process can be difficult with some stations. Outlining the details on how to notify at the AM station with a responsibility on the station to acknowledge notification within some reasonable time would be a welcome addition to this section.
- (b) Part 17 (a) (1) (i) outlines one "significant modification" to a structure. The notion of increasing the "effective electrical height by 5 degrees or more" is not well defined. This leaves much room for interpretation and does not detail the effects of cumulative changes. We recommend either a much simpler quantification for a modification or a much more detailed technique to determine significance.
- (c) Part 17 (a) (3) refers to adverse affects and amount of distortion. It is unclear what would be the responsibility of the proponent licensee or the AM station if the effects of the existing structure already exceed these limits.

- (d) Part 17 (a) (3) (ii) refers to distortion “outside the licensed standard or augmented radiation pattern.” It is our observation that utilizing the proscribed technique of modeling in a “lossless environment” AM station radiation patterns will exceed the theoretical or augmented values without even considering the effects of construction of or modification to structures in the vicinity. Clarification of this section should be included in any rule-making.
- (e) In the proposed paragraph below section 17 (a) (3) (ii) there is a requirement that post-construction or modification measurements not exceed the pre-construction or modification measurements in the (B) event that the pre-construction or modification measurements exceed licensed values. We feel there should be a margin for increase in these instances due to seasonal or equipment variations.
- (f) In the same paragraph as above the “Alternative” approach of having the proponent file for authority to increase the relevant monitor point value is unworkable as the proponent likely has no authority to file on behalf of the AM station.
- (g) Part 17 (a) (4) details the “installation and continued maintenance and proper operation of any detuning apparatus necessary to restore proper performance of the AM antenna system.” This section makes the assumption that the structure in question is all that is preventing proper performance of the AM antenna system. There could be many other structures with greater effect on the radiation pattern, not to mention problems with the AM antenna system itself. There is also no detail of how to quantify the proper performance. Our recommendation would be to reword this section as such:

Absent a showing of no adverse affect as described in Paragraph 3, the proponent of the construction or significant modification shall be responsible for the installation and continued maintenance and proper operation of any detuning apparatus necessary to reduce the affect of the structure in question as a source of disturbance to the AM antenna radiation pattern to less than a 2 dB disturbance as determined by measurements or modeling using the method of moments.

As these proposed rule changes are considered it is our hope that the included comments will be used to help draft a clearer set of guidelines for AM interference analysis.

Respectfully submitted by:

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